



COPY

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
JACKSON ENVIRONMENTAL FIELD OFFICE  
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July 22, 2016

Marion Jordan, Jr. Superintendent  
Wastewater Treatment  
City of Bells  
P.O. Box 760  
Bells, Tennessee 38006-0760

REF: Pretreatment Compliance Inspection  
Bells Pretreatment Program  
Permit No.: TN0026247  
Crockett County

Dear Mr. Jordan,

On Thursday, July 14, 2016, I met with you and Angel West for the purpose of conducting a Pretreatment Compliance Inspection (PCI). The focus of this PCI was to determine progress towards compliance dealing with issues noted during the Pretreatment Audit conducted June 18<sup>th</sup> of last year.

The items identified for discussion during the inspection are as follows:

1. Item (1) of the July 21, 2015 Audit Letter recommended that the City of Bells (City) consider Semi-Annual plant inspections instead of conducting only the once per year minimum. The recommendation was in response to the lack of proof noted the day of the audit under the one year inspection protocol.

*In response to this recommendation the City's adopted a semi-annual inspection format.*

2. Item (2) dealt with the issue of Pictsweet having had four (4) BOD violations over the review period and there was no documentation from the Industrial User (IU) nor the Control Authority (CA) that the violations had ever occurred.

*In like fashion, Bells responded in a positive way by implementing a phone call log book, a closer review of the monthly monitoring reports, and properly noting a violation on the Semi-Annual Report.*

3. Skipping to “Item (5)”. Two points were made in Item (5) and one was related to conducting a comparison of “Flow Proportional” composite sampling to the “Time Proportional” sample collection for your industrial user.

*The sampling was completed on July 28, 2015. The results have been summarized in the spreadsheet included with this letter. It bears pointing out that both samples collected revealed BOD exceeding their IU Permit in all four samples.*

*With this in mind, a Notice of Violations (NOV) appears to have been warranted or at the very least, a verbal warning for the monthly average Five Day BOD. These samples also qualified for follow-up sampling which does not appear to have been completed. These apparent violations should have then been reported on Bell's October, 2015 Semi-Annual Report in addition to the December, 2015 violation of BOD along with all actions to re-establish compliance. Please note, anytime sampling is conducted, the results qualify as official record and must be reported. In this case, these samples would qualify as compliance sampling by Bells, the Control Authority, and any violation noted must be treated just like any other violation during the year.*

The second point under “Item 5” was related to Angle West contacting Brad Smith of the Jackson Environmental Field Office (JEFO) to assist her with the laboratory's QA/QC for sample analysis.

*This has now been done. In discussing this meeting with Brad Smith, he acknowledged that he had met with her. During the meeting he offered suggestions as to how to work towards full compliance with 40CFR Part 136 Requirements. He also strongly recommended that she contact Dwayne Culpepper of TAUD for further assistance due to his time constraints.*

4. Item (6) of the audit letter required a revised copy of Bells' Sewer Use Ordinance (SUO) and Enforcement Response Plan (ERP) to be sent to the Division's of Water Resources's (DWR) Pretreatment (PT) Section for review and preliminary approval.

*Part of this process has been completed. But according to a letter dated June 1, 2016, from the Division's Pretreatment Section, the City has fulfilled all of the proof of “Public Notice” requirements except for the revisions contained in the SUO and the ERP.*

*During this inspection you assured me that this proof had been submitted as requested. Just to make sure, I contacted our Pretreatment Section and as of the date of this inspection, the PT Section had not received a copy.*

5. During this inspection we discussed the expiration of the existing Industrial User Permit (IUP) for Pictsweet. You and Ms. West both explained that Bells had extended their existing IUP by letter.

*Unfortunately, the City did not keep a copy. You immediately called Pictsweet and they committed to obtain a copy for your records. May I remind you how important this type of document is and that a copy should have been kept on file with the IU's permit.*

**The Industrial Inspection:**

We met with Josh Work of Pictseet who has temporarily assumed the "Plant Manager" role. The processes are the same as they were during last years Pretreatment Audit. The only changes noted was that considerable construction was underway to install a higher level of food production protection. Even though Pictsweet does not produce "Ready to Eat" foods, they have made a Corporate decision to install the "Ready to Eat" level of food protection to insure their customer's the safest product possible.

**ACTION ITEMS:**

1. Please be reminded that once your NPDES Permit becomes effective, you have from the the effective date, 120 days to complete your "Industrial Waste Survey" and to re-establish your "Local Limits".
2. Once the "Local Limits" have been approved, revise Pictsweet's Industrial User Permit with all required and recommended changes.
3. Provide this office with a copy of the City's letter that extended Pictsweet's "Industrial User Permit". Be sure to maintain a copy in your IU Permit file.
4. Make sure that the City of Bells is current with the requirements of the June 1, 2016 letter from our Pretreatment Section regarding "Streamlining Legal Authority Public Notice Requirements". The required response date to that letter was Wednesday, July 20, 2016.

It is highly recommended that when you are submitting important documentation to the Division of Water Resources that you send the documents by "Certified Mail" or some other vendor that provides confirmation of delivery such as FedEx or UPS.

5. I would like to schedule a time to come by and discuss the results of the Flow Proportion versus Time Proportional composite sample results with you. I will initiate the contact to set-up a time and date.

**Your courtesy and cooperation shown to me during this inspection was greatly appreciated. If you have any questions concerning this letter or any other issue that you think I might be able to assist you with, feel free to call me at 731.512.1362 or by email at [James.W.Scott@tn.gov](mailto:James.W.Scott@tn.gov).**

Sincerely,



**James W. Scott  
Jackson Environmental Field Office  
1625 Hollywood Drive  
Jackson, Tennessee 38305**

**CC**

**Mayor Joe Williams  
City of Bells  
P.O. Box 760  
Bells, Tennessee 38006-0760**

**Pretreatment Section, NCO**

SAMPLE COLLECTED JULY 28, 2016				SAMPLE COLLECTED JULY 31, 2016		CURRENT PICTSWEET PERMIT	
FLOW PROPORTIONAL		TIME PROPORTIONAL	UNITS	FLOW PROPORTIONAL	TIME PROPORTIONAL	MO. AVE	MO. MAX
ICP METALS	Value	Value		VALUE	VALUE		
Arsenic	ND	ND	mg/l	ND	ND		
Chromium	0.00145	0.00189	mg/l	0.00173	0.00415		
Copper	0.0255	0.0225	mg/l	0.0184	0.0183		
Lead	0.00257	0.00427	mg/l	0.00324	0.00264		
Molybdenum	0.012	0.0296	mg/l	0.00659	0.0267		
Nickel	0.00768	0.0129	mg/l	0.00595	0.00875		
Selenium	ND	ND	mg/l	ND	ND		
Silver	ND	ND	mg/l	ND	ND		
Zinc	0.16	0.445	mg/l	0.0549	0.0569		
MERCURY							
Mercury	ND	ND	mg/l	ND	ND		
BOD, 5 DAY, 20 C							
BOD	600	1,240	mg/l	591	606	500	900
TOTAL SUSPENDED SOLIDS							
Suspended Solids	576	870	mg/l	218	380	REPORT	REPORT
Residue, Non-Filterable							
SEMIVOLATILE ORGANICS							
Naphthalene	ND	ND	mg/l	ND	ND		
Surr: 2,4,6-Tribromophenol	70.2	72.6	%REC	60.1	89.8		
Surr: 2-Fluorobiphenyl	82.9	76.4	%REC	76.7	83.1		
Surr: Fluorophenol	122	121	%REC	120	122		
Surr: Nitrobenzene-d5	79.288.6	98.5	%REC	101	104		
Surr: Phenol-d5	88.6	52.8	%REC	76.1	65.7		
Surr: p-Terphenyl-d14	96.1	110	%REC	101	95.1		
PURGEABLES							
1, 1, 1-Trichloroethne	ND	ND	mg/l	ND	ND		
Carbon Tetrachloride	ND	ND	mg/l	ND	ND		
Chloroform	ND	ND	mg/l	0.00358	ND		
Ethylbenzene	ND	ND	mg/l	ND	ND		
Methylene chloride	ND	ND	mg/l	ND	ND		
Tetrachloroethene	ND	ND	mg/l	ND	ND		
Toluene	ND	ND	mg/l	ND	ND		
trans-1,2-Dichloroethane	ND	ND	mg/l	ND	ND		
Trichloroethane	ND	ND	mg/l	ND	ND		
TOTAL CYANIDE							
Cyanide	ND	ND	mg/l	ND	ND		
TOTAL PHENOLS							
Phenols	0.0192	0.0258	mg/l	0.037	0.0132		

 Violation of Monthly Average  
 Violation of Monthly Maximum

# POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

## PCI CHECKLIST CONTENTS

Cover Page	
[ X ] Section I	IU File Evaluation
[ X ] Section II	Supplemental Data Review/Interview
[ X ] Section III	Evaluation and Summary
[ X ] Attachment A	Pretreatment Program Status Update
[ X ] Attachment B	Pretreatment Program Profile Worksheets
[ X ] Attachment C	[ X ] WENDB Data Entry Worksheet
	[ X ] RNC Worksheet
	[ X ] IU Site Visit Report Form (Optional)
	[ X ] File Review Worksheets (Optional)
Attachment D	Supporting Documentation

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CA name and address:

**City of Bells, Tennessee Lagoons System  
(Attention Marlon Jordan, Jr.)  
P.O. Box 760  
Bells, TN 38002**

Date(s) of PCI

**07.14.2016**

Period covered by PCI


**04.01.2015 – 03.31.2016**

PIRT / DSS incorporated in NPDES permit?

Yes

No

### INSPECTOR (S)

Name	Title/Affiliation	Telephone Number
<b>James W. Scott</b> 	<b>Environmental Protection Specialist</b>	<b>731.512.1362</b>

### CA REPRESENTATIVE (S)

Name	Title/Affiliation	Telephone Number
<b>Marlon C. Jordon, Jr.</b>	<b>POTW Superintendent</b>	<b>731.663.2383</b>
<b>Angel West</b>	<b>Assistant Lab Tech</b>	<b>731.663.2383</b>

\*Identified program contact

## ACRONYM LIST

Acronym	Term
BMR	Baseline Monitoring Report
CA	Control Authority
CFR	Code of Federal Regulations
CIU	Categorical industrial user
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined wastestream formula
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement response plan
FTE	Full-time equivalent
FWA	Flow-weighted average
gpd	Gallons per day
IU	Industrial user
IWS	Industrial waste survey
MGD	Million gallons per day
MSW	Municipal solid waste
NA	Not applicable
N/D	Not determined
NPDES	National Pollutant Discharge Elimination System
NSCIU	Nonsignificant Categorical Industrial User
O&G	Oil and grease
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
RCRA	Resource Conservation and Recovery Act
RNC	Reportable noncompliance
SIU	Significant industrial user
SNC	Significant noncompliance
TCLP	Toxicity Characteristic Leachate Procedure
TRC	Technical review criteria
TTO	Total toxic organics
WENDB	Water Enforcement National Data Base

## SECTION I: IU FILE EVALUATION

**INSTRUCTIONS:** Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on problems identified. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

NARRATIVE COMMENTS			
<b>FILE <u>Pic</u></b> Industry name and address  <b>Pictsweet Frozen Foods</b> <b>10 Pictsweet Drive</b> <b>Bells, TN 38006</b>		Total flow (gpd)	Process flow (gpd)  <div style="text-align: center;"><b>693,000 &amp; 959,000</b></div> <div style="text-align: center;"><b>March, 2016   October, 2015</b></div>
		Type of industry (products manufactured)  <div style="text-align: center;"><b>Frozen Foods</b></div>	
Industry visited during PCI  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category  <div style="text-align: center;"><b>N/A</b></div>	Compliance status <input type="checkbox"/> SNC (period: _____ ) <input type="checkbox"/> Noncompliance/corrected <div style="text-align: center;"><b>In Compliance</b></div> <input type="checkbox"/> Noncompliance/continuing	
Comments  <b>Josh Work is the "Acting" Plant Manager</b>			



## SECTION I: IU EVALUATION (Continued)

Industry Name					<p><i>INSTRUCTIONS: Evaluate the contents of SIU files. If no problem exists for a particular question, mark the square with a check (✓). Use (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Where a problem is indicated, mark with a numerical value and provide a corresponding explanation in the comment area below. Comment on each problem identified. For example, if the file is missing a notification of classification, place a (1) in the square and a matching statement as to the nature of the problem that exists in the space below. The next problem would be marked as (2) and so on. Clearly indicate the file that each comment pertains to; also indicate where a comment applies to all the files.</i></p>	
File	File	File	File	File		
<u>Pic</u>	___	___	___	___		
<b>IU FILE REVIEW</b>						
<b>A. CA NOTIFICATION OF IU</b>					<b>Reg. Cite</b>	
<b>NA</b>					1. Notification of classification or change in classification	403.8(f)(2)(iii)
<b>NA</b>					2. Notification of applicable standards/requirements/RCRA	403.8(f)(2)(iii)
<p>Comments</p>						

## SECTION I: IU EVALUATION (Continued)

File Pic	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					<b>B. ISSUANCE OF IU CONTROL MECHANISM</b>	
					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
<b>X</b>					a. Individual control mechanism	
<b>NA</b>					b. General control mechanism	403.8(f)(1)(iii)(A) 403.8(f)(1)(iii)(B)
					2. Individual control mechanism contents	
<b>1</b>					a. Statement of duration ( $\leq 5$ years)	
<b>X</b>					b. Statement of nontransferability	
<b>X</b>					c. Applicable effluent limits (local limits, categorical standards, Best Management Practices)	
					d. Self monitoring requirements	403.8(f)(1)(iii)(B)(4)
<b>X</b>					• Identification of pollutants to be monitored	
<b>X</b>					• Info on waiver if allowing a waiver for pollutant not present or expected to be present (for CIUs only)	
<b>1</b>					• Sampling locations/discharge points	
<b>X</b>					• Sample types (grab or composite)	
<b>X</b>					• Reporting requirements (including all monitoring results)	
<b>X</b>					• Record-keeping requirements	
<b>X</b>					e. Statement of applicable civil and criminal penalties	
<b>X</b>					f. Compliance schedules	
<b>X</b>					g. Notice of slug loading	
<b>X</b>					h. Notification of spills, bypasses, upsets, etc.	
<b>X</b>					i. Notification of significant change in discharge	
<b>X</b>					j. 24-hour notification of violation/resample requirement	
<b>2</b>					k. Slug discharge control plan, if determined by the POTW to be necessary.	
<b>Comments</b>  <div style="margin-left: 20px;"> <b>1. Four Year IU Permit</b>   <b>2. Slug Control Plan is required and a copy was available</b> </div>						

## SECTION I: IU EVALUATION (Continued)

File Pic	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					<b>B. ISSUANCE OF IU CONTROL MECHANISM (cont.)</b>	
					3. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
					a. Involve the same or similar operations	
					b. Discharge the same types of wastes	
					c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
					• Contact information	
					• Production processes	
					• Types of waste generated	
					• Location for monitoring all wastes covered by the general permit	
					e. Documentation to support the POTW's determination	
<div style="display: flex; justify-content: space-between; align-items: flex-start; margin-bottom: 10px;"> <span>Comments</span> </div> <div style="text-align: center; font-size: 2em; margin-top: 100px;">N/A</div>						

## SECTION I: IU EVALUATION (Continued)

File Pic	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					<b>C. CA APPLICATION OF IU PRETREATMENT STANDRDS</b>	
<b>X</b>					1. IU categorization	403.8(f)(1)(ii)
<b>NA</b>					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
					a. Classification by category/subcategory	
					b. Classification as new/existing source	
					c. Application of limits for all regulated pollutants	
					d. Classification of nonsignificant CIU	403.3(v)(2)
<b>X</b>					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
					4. Application of Best Management Practices	403.8(f)(1)(iii)(B)(4)
					5. Calculation and application of production based-standards	403.6(c)
					6. Calculation and application of CWF or FWA	403.6(d)&(e)
					7. Application of most stringent limit	403.8(f)(1)(ii)
<div style="margin-bottom: 5px;">Comments</div>						

## SECTION I: IU EVALUATION (Continued)

File Pic	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					<b>D. CA COMPLIANCE MONITORING</b>	
					Sampling	
<b>X</b>					1. Sampling (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has waived monitoring for CIU	
<b>X</b>					• Sample waived pollutant(s) at least once during the term of the control mechanism	403.8(f)(2)(v)(A)
<b>Y</b>					2. Sampling at frequency specified in approved program	
<b>Y</b>					3. Documentation of sampling activities	403.8(f)(2)(vi)
<b>Y</b>					4. Analysis for all regulated parameters	
<b>Y</b>					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
<b>1</b>					6. Inspection (once a year, except as otherwise specified)	403.8(f)(2)(v)
<b>NA</b>					a. If a POTW has determined a discharger to be a NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year (verification of certification forms submitted by NSCIUs, compliance with pretreatment standards and requirements)	
<b>Y</b>					7. Inspection at frequency specified in approved program	
<b>X</b>					8. Documentation of inspection activities	403.8(f)(2)(vi)
<b>2</b>					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)
<p>Comments</p>  <p><b>1. Have changed from an once per year frequency to a two per year.</b></p> <p><b>2. Pictsweet was required to develop a Slug Control Plan and a current one was available In their folder.</b></p>						

## SECTION I: IU EVALUATION (Continued)

File Pic	File	File	File	File	IU FILE REVIEW	Reg. Cite
					<b>E. CA ENFORCEMENT ACTIVITIES</b>	
					1. Identification of violations	403.8(f)(2)(vii)
					a. Discharge violations	
					b. Monitoring/reporting violations	
					c. Compliance schedule violations	
					2. Calculation of SNC	403.8(f)(2)(vii)
					3. Adherence to approved ERP	403.8(f)(5)
					4. Escalation of enforcement	403.8(f)(5)
					5. Publication for SNC	403.8(f)(2)(vii)
<b>Comments</b>  <div style="margin-left: 20px;"> 1. A monthly average of BOD was noted. The sample contained a BOD of 590 mg/l compared to the permitted monthly average of 500 mg/l. The violation sample was collected on 12/4/15. A follow-up sample was collected with a result of 233 mg/l giving Pictsweet a 412 monthly average which is below the 500 mg/l. </div>						

## SECTION I: IU EVALUATION (Continued)

File Pic	File	File	File	File	IU FILE REVIEW	Reg. Cite
					<b>F. IU COMPLIANCE STATUS</b>	
					Self-Monitoring and Reporting	
Y					1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
Y					2. Analysis of all required pollutants	403.12(g)(1)&(h)
NA					3. Submission of BMR/90-day report	403.12(b) &(d)
Y					4. Periodic self monitoring reports	403.12(e)&(h)
Y					5. Reporting all required pollutants	403.12(g)(1)&(h)
Y					6. Signatory/certification of reports	403.12(l)
NA					7. Annual certification by NSCIUs	403.12(q)
NA					8. Submission of compliance schedule reports by required dates	403.12(c)
					9. Notification within 24-hours of becoming aware of violations	403.12(g)(2)
1					• Discharge violation	
NA					• Slug load	
NA					• Accidental spill	
2					10. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
NA					11. Notification of hazardous waste discharge	403.12(j)&(p)
Y					12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
3					13. Notification of significant changes	403.12(j)
<b>INSTRUCTIONS: Indicate the IU's noncompliance status by placing an "X" in the appropriate box.</b>						
NA					<b>Discharge</b>	
					13. Noncompliance with discharge limits (but not SNC)	
NA					14. SNC	403.8(f)(2)(viii)
					a. Chronic violations	
					b. TRC	
					c. Pass through or interference	403.5(a)(1)
					• Spill or slug load	403.12(f)
					d. Other discharge violations (specify)	
NA					<b>Reporting</b>	
					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(viii)
					16. SNC with reporting requirements	403.8(f)(2)(viii)
<b>Comments</b>  <div style="margin-left: 20px;"> <p>1. Violation of monthly average BOD 590/ 500. Resample was 233 mg/l. Giving a 412 mg/l monthly average.</p> <p>2. Violation sample was taken 12/4/15. Resample was 12/18/15.</p> <p>3. Bells has been made aware of pending expansion and quality of their product improvements. No additional flow or loading anticipated.</p> </div>						

## SECTION I: IU EVALUATION (Continued)

File Pic	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					<b>G. OTHER</b>	
<p>Comments</p> <p style="font-size: 2em; margin-top: 150px;">NO ADDITIONAL COMMENTS</p>						

SECTION I COMPLETED BY: <b>James W. Scott</b>	DATE: <b>07.14.2016</b>
TITLE: <b>EPS</b>	TELEPHONE: <b>731.512.1362</b>



## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

**INSTRUCTIONS:** Complete this section during the onsite visit based on CA activities since the last PCI or audit. Attach documentation where appropriate. Specific data may be required in some cases.

### A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

<p>1. a. Did the CA make substantial changes to the pretreatment program recently? (e. g., definitions, limits)?</p> <p>b. Were the changes approved by TDEC?</p> <p>Describe any recent changes that have been implemented.</p>	<p>Yes</p>	<p>No</p>
<p><b>Local Limits</b></p>		
<p><b>X</b></p>		

<p>2. Is the CA in the process of making any substantial changes to the pretreatment program (including legal authority, local limits, streamlining requirements, etc.)?</p> <p>If yes, describe.</p> <p style="text-align: center;"><b>Once Bells' NPDES Permit is final, they will be recalculating their local limits.</b></p>	<p>Yes</p>	<p>No</p>
<p><b>X</b></p>		

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

### B. IU CHARACTERIZATION [ 403.8(f)(2)(i)&(ii)]

1. How and when does the CA update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

**As required when their new NPDES WW Lagoon permit is issued. If something changes with the existing Industry, the industry is required to contact the City of Bells.**

2. How many IUs are currently identified by the CA in each of the following groups?

a. 

1
---

 SIUs (as defined by the CA) [WENDB - SIUS]

0
---

 CIUs [WENDB - CIUS]

1
---

 Noncategorical SIUs\*\*

b. 

--

 Other permitted nonsignificant IUs

c. 

1
---

 TOTAL

d. 

--

 NSCIUs\*\* (as defined by 40 CFR 403.3(v)(2))

List NSCIUs:

\*\* A NSCIU never discharges more than 100 gpd of total categorical wastewater (excluding, noncontact cooling and boiler blowdown wastewater) and the following conditions are met:

- o Discharger consistently complied with all applicable categorical requirements
- o Discharger submits annual certification statement required in 40 CFR 403.12(q)
- o Discharger never discharges any untreated concentrated wastewater.

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

### C. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]

- |    |  |      |
|----|--|------|
| 1. | a. How many SIUs (as defined by the CA) are required to be covered by an individual control mechanism? | 100% |
|----|--|------|

- b. How many SIUs (as defined by the CA) are required to be covered by a general control Mechanism? 0

List SIUs:

- |  |   |
|--|---|
| c. How many SIUs are not covered by an existing, unexpired permit or other control mechanism ? [WENDB - NOCM] [RNC - II] | 0 |
|--|---|

If any, explain.

- |    |   |   |
|----|---|---|
| 2. | How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism ? [RNC - II] | 0 |
|----|---|---|

If any, explain. .

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

### D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. a. How many SIUs have not been evaluated for the need to develop slug discharge control plans\*? [403.8(f)(2)(vi)]

0

b. List the SIUs below or attach additional sheets as needed.

\* For dischargers identified as significant prior to November 14, 2005, this evaluation must be performed at least once by October 14, 2006. Additional SIUs must be evaluated within 1 year of being designated as a SIU.

2. Did the CA apply all applicable categorical standards and local limits to IUs whose wastes are hauled to the POTW ?

N/A

Yes

No

X

If yes, identify the industries.

If no, explain.

3. Did any IUs notify the CA of a hazardous waste discharge? [403.12(j)&(p)]

Yes

No

X

If yes, identify and explain.

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

### E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. Identify the following.

Program Aspect	Required Frequency	Actual Frequency	Explain Difference
<b>a. Inspection</b>			
• CIUs			
• NSCIUs			
• Other SIUs	<b>2/ year</b>	<b>2/ year</b>	
<b>b. Sampling (by CA)</b>			
• CIUs			
• NSCIUs			
• Other SIUs	<b>1/ month</b>	<b>1/ month</b>	
<b>c. Self – Monitoring</b>			
• CIUs			
• Other SIUs	<b>1/ month</b>	<b>1/ month</b>	
<b>d. Reporting</b>			
• CIUs			
• NSCIUs			
• Other SIUs	<b>1/ month</b>	<b>1/ month</b>	

2. In the past 12 months, how many, and what percentage of, SIUs were the following? [403.8(f)(2)(vi)] [WENDB - NOIN] [RNC - II]

- a. Not sampled at least once  
b. Not inspected at least once

<b>0</b>	<b>0 %</b>
<b>0</b>	<b>0 %</b>

If any, explain.

3. If the CA does all of the sampling in lieu of the industry, does the CA repeat the sample and analysis within 30 days of any violation?

**NA**

4. Does the CA use Best Management Practices (BMP) as a local limit? If yes, did they make necessary changes to their legal authority and the IU control mechanism? Do they have documentation of supporting rationale for each BMP?

**NA**

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

### F. ENFORCEMENT

1. Which of the following enforcement actions did the CA use?

- a. Notice or letter of violation
- b. Administrative orders
- c. Administrative fines
- d. Show cause hearings
- e. Compliance schedules
- f. Permit revocation
- g. Civil suits
- h. Criminal suits
- i. Termination of services
- j. Other (specify)

N/A	Yes	No
X		
X		
X		
X		
X		
X		
X		
X		
X		
1		

Explain if appropriate

(1) By phone

2. Did the CA comply with its approved ERP? [403.8(f)(5)] [RNC - II]

N/A	Yes	No
	X	

3. Indicate the number and percent of SIUs that were identified as being in SNC\* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the inspection.

SNC Evaluation Period

N/A	
*SNC defined by:	
POTW	
EPA	X

	0 %	Applicable pretreatment standards
	0 %	Applicable reporting requirements
	0 %	Pretreatment compliance schedules

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

### F. ENFORCEMENT (Continued)

		Yes	No
4.	Did the CA publish all SIUs in SNC in a newspaper of general circulation that		

4. Did the CA publish all SIUs in SNC in a newspaper of general circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW in accordance with NPDES permit requirements? [403.8(f)(2)(viii) ]

N/A

5. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENDB - SINNN]

NA

6. a. Did the CA experience any of the following caused by industrial discharges?

	Yes	No	Unk	Explain
• Interference		X		
• Pass through		X		
• Fire or explosions (flashpoint, etc.)		X		
• Corrosive structural damage		X		
• Flow obstruction		X		
• Excessive flow rates		X		
• Excessive pollutant concentrations		X		
• Heat problems		X		
• Interference due to O&G		X		
• Toxic fumes		X		
• Illicit dumping of hauled wastes		X		
• Worker health and safety		X		
• Other (specify)		X		

b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]

Yes	No

N/A

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

<b>F. ENFORCEMENT (Continued)</b>													
7.	a. How many SIUs are on compliance schedules?	0											
	b. List these SIUs by name and compliance schedule end dates (attach additional sheets as needed).												
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 60%;">SIU</th> <th style="width: 40%;">End Date</th> </tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </table>	SIU	End Date										
SIU	End Date												
8.	Were any CIUs allowed more than 3 years from the effective date of a categorical standard to achieve compliance? [403.6(b)] If yes, identify and explain.	Yes	No										
N/A													
9.	a. Were any SIUs in noncompliance since the last pretreatment inspection by TDEC? b. If yes, what enforcement was taken?	Yes	No										
			X										
	c. Have they returned to compliance? d. If not, what is the CA doing to bring the SIU back into compliance?												
N/A													
<b>G. ADDITIONAL EVALUATIONS</b>													

SECTION II COMPLETED BY: <b>James W. Scott</b>	DATE: <b>07.14.2016</b>
TITLE: <b>ESP</b>	TELEPHONE: <b>731.512.1362</b>
POTW REPRESENTATIVE: <b>Angel West, Lab Tech, Marlon Jordan, Jr.</b>	DATE: <b>07.14.2016</b>
PROVIDING RESPONSES: <b>POTW Superintendent</b>	TELEPHONE: <b>731.663.2383</b>



**ATTACHMENT A**

**PRETREATMENT PROGRAM STATUS UPDATE**

## PRETREATMENT PROGRAM STATUS UPDATE

**INSTRUCTIONS:** This attachment is intended to serve as an update of program status. It should be updated prior to each audit based on information obtained from the most recent PCI and / or audit and the last pretreatment program performance report

### A. CA INFORMATION

1. CA name <b>City of Bells Lagoon System</b>		
2. a. Pretreatment contact <b>Angel West, Lab Tech</b>	b. Mailing address  <b>P.O. Box 760 Bells, TN 38006</b>	
c. Title <b>Lab Tech</b>	d. Telephone number <b>731-663-2383</b>	
3. Date of last CA report to Approval Authority <b>April 21, 2016</b>		
4. Is the CA currently operating under any pretreatment - related consent decree, Administrative Order, compliance schedule, or other enforcement action?	<b>Yes</b>	<b>No</b>
		<b>X</b>
5. Effluent and sludge quality		
a. List the NPDES effluent and sludge limits violated and the suspected cause(s)		
<b>Parameters Violated</b>	<b>Cause(s)</b>	
<b>NONE</b>		
b. Has the treatment plant had any violations of bio-solids regulations?		
<b>N/A</b>		

### B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.

	Last PCI	Last Audit	Program Report
	Date: 06.27.2011	Date: 06.18.2015	Date:???
a. Program modification		<b>X- Streamlining</b>	
b. Legal authority	<b>X</b>		
c. Local limits	<b>X</b>	<b>X</b>	
d. IU characterization			
e. Control mechanism		<b>X- Permits</b>	
f. Application of pretreatment standards			
g. Compliance monitoring			
h. Enforcement program	<b>X</b>	<b>X- ERP</b>	
i. Data management		<b>X</b>	
j. Program resources			
k. Other (specify)			

## PRETREATMENT PROGRAM STATUS UPDATE

### B. PRETREATMENT PROGRAM STATUS

2. Is the CA presently in RNC for any of these violations ?	Data Source	Yes	No
a. Failure to enforce against pass through and / or interference [ RNC - I ][ SNC ]			X
b. Failure to submit required reports within 30 days [ RNC - I ][ SNC ]			X
c. Failure to meet compliance schedule milestones within 90 days [ RNC - I ][ SNC ]			X
d. Failure to issue / reissue control mechanisms to 90 percent of SIUs within 6 months [ RNC - II ]			X
e. Failure to inspect or sample 80 percent of SIUs within the last 12 months [ RNC - II ]			X
f. Failure to enforce standards and reporting requirements [ RNC - II ]			X
g. Other (specify) [ RNC - II ]			X

3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit, (whichever is most recent)

Name of SIU in SNC	Compliance Status	Source

4. Indicate the number and percent of SIUs that were identified as being in SNC\* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the audit.

SNC Evaluation Period

	<b>0</b> %	Applicable pretreatment standards		
	<b>0</b> %	Applicable reporting requirements		
	<b>0</b> %	Pretreatment compliance schedules		

\*SNC defined by:

<b>POTW</b>	
<b>EPA</b>	<b>X</b>

5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program

**There have been no issues over the period time related to this inspection.**

ATTACHMENT A COMPLETED BY: **James W. Scott**

DATE: **07.14.2016**

TITLE: **EPS**

TELEPHONE: **731.512.1362**

## **ATTACHMENT C**

### **WORKSHEETS**

- **IU SITE VISIT DATA SHEET**
- **WENDB DATA ENTRY WORKSHEET**
  - **RNC WORKSHEET**

# IU SITE VISIT REPORT FORM

## III. IU SITE VISIT REPORT FORM

*INSTRUCTIONS: Use this form to record observations made during the site visit and findings based on the site visit. Please provide as much detail as possible.*

Name of industry and city

**Pictsweet  
Bells, TN**

Date of visit

**07.14.2016**

Time of visit

**10:30 am**

Name(s) of inspector(s)

**James W. Scott + Marlon C. Jordan, Jr. (Jr.) & Angel West from Bells WWTL's**

Provide name(s) and title(s) of industry representative(s)

Name

Title

**Josh Work**

**"Acting" Plant Manager**

1. What does this industry produce?

**Non "Ready to Eat" Frozen Food Products**

2. How is this industry classified by the POTW? Is this classification correct?

**Significant Non-Categorical**

3. Have there been any significant changes in processes or flow?

**NO**

4. What raw materials are used?

**Raw vegetables**

## IU SITE VISIT REPORT FORM (CONTINUED)

5. What processes are used to make the product(s) ? (Attach a step by step diagram if possible.)

1. Unloading of vegetables
2. Dirt reel for initial cleaning
3. Large rock & chunk removal
4. Cluster removal-cutter
5. MAT 3000 (removes unwanted) N.P. Snippers
6. Washer
7. Blanch and Freeze
8. Color sorter which removes bad product
9. Freezer storage

6. Where is water used and what is the source of the water (city, well, river, etc.) ?

1. Small rock unit, washer & the “blanch & cool” unit
2. City Water for domestic use. Their own wells for production. They will soon be installing a new Well.

7. Describe the processes that discharge wastewater.

Small rock unit, washer & the “blanch & cool” unit

## IU SITE VISIT REPORT FORM (CONTINUED)

8. Describe the sample location. Are the CA and industry using the same location?

**A manhole located on Highway 79, just up-stream of the lagoon.**

9. Describe the treatment system which is in place.

**Hydro sieve and tower screen**

## IU SITE VISIT REPORT FORM (CONTINUED)

10. What chemicals are maintained onsite? How are they stored ? Is adequate spill prevention in place?

1. Various disinfectants & cleaners
2. Solvents for tool cleaning
3. Oils & greases for equipment

11. Are any hazardous wastes stored or discharged?

**Florescent light bulbs**

Additional comments.

IU SITE VISIT REPORT FORM

COMPLETED BY: **James W. Scott**

TITLE: **EPS**

DATE:

**07.14.2016**

TELEPHONE:

**731.512.1362**

C-4



## WENDB DATA ENTRY WORKSHEET

<b>II. WENDB DATA ENTRY WORKSHEET</b>		
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.		
CA name	<b>City of Bells Lagoon System</b>	
NPDES number	<b>TN0026247</b>	
Date of audit	<b>06.18.2016</b>	
	<b>Checklist Reference</b>	<b>Data</b>
• Number of SIUs*	II.B.2.a.	<b>1</b>
• Number of CIUs	II.B.2.a.	<b>0</b>
- Number of SIUs without control mechanism	II.C.1.a.	<b>0</b>
- Number of SIUs not inspected	II.E.2.b.	<b>0</b>
- Number of SIUs not sampled	II.E.2.a.	<b>0</b>
- Number of SIUs in SNC with Pretreatment Standards	II.F.3.	<b>0</b>
- Number of SIUs in SNC with Reporting Requirements	II.F.3.	<b>0</b>
- Number of SIUs in SNC with Pretreatment Schedule	II.F.3.	<b>0</b>
- Number of SIUs in SNC Published in the Newspaper	II.F.4.	<b>0</b>
- SIUs on Schedules	II.F.7.	<b>0</b>
*The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."		
**As defined in 40 CFR 403.8(f)(2)(viii).		

WENDB DATA ENTRY WORKSHEET	<b>James W. Scott</b>	DATE:	<b>07.14.2016</b>
COMPLETED BY:		TELEPHONE:	<b>731.512.1362</b>
TITLE:	<b>EPS</b>		

## RNC WORKSHEET

### III. RNC WORKSHEET

INSTRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC.

CA name **City of Bells**

NPDES number **TN0026247**

Date of audit **June 18, 2015**

		Level	Checklist Reference
<b>NA</b>	Failure to enforce against pass through and / or interference	I	II.G.6
<b>NA</b>	Failure to submit required reports within 30 days	I	Attach A.B.2.b
<b>NA</b>	Failure to meet compliance schedule milestone date within 90 days	I	Attach A..B.2.c
<b>NA</b>	Failure to issue / reissue control mechanisms to 90% of SIUs within 6 months	II	II.D.1.b
<b>NA</b>	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.F.2.a
<b>NA</b>	Failure to enforce pretreatment standards and reporting requirements (more than 15% of SIUs in SNC)	II	I.C.1; II.G.2
<b>NA</b>	Other (specify)	II	

### SNC

<b>NA</b>	CA in SNC for violation of any Level I criterion
<b>NA</b>	CA in SNC for violation of two or more Level II criterion

For more information on RNC, please refer to EPA's 1990 Guidance for Reporting and Evaluating POTTW Noncompliance with Pretreatment Implementation Requirements

RNC WORKSHEET COMPLETED BY: **James W. Scott**  
TITLE: **EPS**

DATE: **07.14.2016**  
TELEPHONE: **731.512.1362**